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November 23, 2022

Via ECF Only

The Honorable Katharine H. Parker U.S. Magistrate Judge U.S. District Courthouse 500 Pearl Street, Courtroom 15C New York, New York 10007

Re: Graham Chase Robinson v. Robert De Niro et al.

Civil Action No.: 19cv9156 (LJL) (KHP) (the "Action")

Dear Judge Parker:

This office represents Defendant Robert De Niro, and serves as co-counsel, along with Tarter Krinsky & Drogin LLP, for Defendant Canal Productions, Inc. ("Canal"). Canal writes this letter as a follow-up to the letter motion to seal it filed on November 20, 2022 (ECF Doc. No. 332). As referred to in that motion letter, Canal initiated a dialogue with Plaintiff's counsel concerning the proposed redactions encompassed by the motion to seal, and has provided Plaintiff's counsel with all of the documents at issue. Due to the holidays this week, the parties' counsel expect they will exchange views regarding the proposed reactions by early next week. The parties will file a joint motion to seal promptly following the completion of their dialogue concerning the proposed redactions.

Canal appreciates the Court's attention to the foregoing.

Respectfully submitted,

TARTER KRINSKY & DROGIN LLP

TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP

/s/ Laurent S. Drogin

/s/ Gregory R. Bennett